

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CUSTOMINK, LLC,)	
)	
Plaintiff,)	
)	Case No. 1:11cv-662 CMH-TCB
v.)	
)	
SHIRTMAGIC, LLC,)	
)	
Defendant.)	
	/	

**JOINT MOTION TO EXTEND DEADLINES FOR EXPERT DISCLOSURES AND
REBUTTAL EXPERT DISCLOSURES**

Plaintiff, CustomInk, LLC (“Plaintiff”) and Defendant, Shirtmagic, LLC, (“Defendant”) by and through undersigned counsel, hereby jointly move this Court for an order extending the time to serve Defendant’s expert disclosure and the parties’ rebuttal expert disclosures by ten (10) days, and in support state as follows:

1. Defendant’s expert disclosures are currently due on November 29, 2011.
2. Plaintiff has recently seasonably supplemented its discovery and so Defendant (and Defendant’s expert) require additional time to review before rendering an opinion.
3. Likewise, in light of the additional time needed for Defendant’s expert disclosures, the parties would need additional time to serve their rebuttal expert disclosures. The current deadline for parties to serve their rebuttal expert disclosures is December 2, 2011.
4. Counsel for Plaintiff and Defendant believe that a short ten (10) day extension for Defendant’s expert disclosure and a fifteen (15) day extension of the rebuttal expert disclosure deadline would provide sufficient time for these expert disclosures to be completed.

5. This short extension of time will not affect the current discovery cut-off date which is set for January 13, 2012.

WHEREFORE, Plaintiff, CustomInk, LLC and Defendant, Shirtmagic, LLC, jointly request that this Court enter an order extending the current deadline for Defendant's expert disclosure by ten (10) days to December 9, 2011 and the parties rebuttal expert disclosure deadline by ten (10) days to December 12, 2011, and for such other further relief as this Court deems just and proper.

Respectfully submitted,

ESPINOSA |TRUEBA, PL

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November 2011, I will electronically file the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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I hereby further certify that I will mail this document by U.S. Mail to any non-filing users in this case.

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